



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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January 22, 2025

**BY ECF**

Honorable Joseph A. Marutollo  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Slade v. City of New York, et al.,  
24-CV-6711 (NCM) (JAM)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and write on behalf of the City as an interested party in the above-referenced matter.<sup>1</sup> Pursuant to Your Honor's Individual Rule IV, the City respectfully requests a three-week extension of time to respond to the Court's Valentin order, from January 24, 2025 to February 14, 2025. This is the first request for an extension of the Valentin deadline. Due to Plaintiff's incarcerated status, we have been unable to obtain his position on this request.

By way of background, Plaintiff brings claims under 42 U.S.C. § 1983 arising from, *inter alia*, his December 28, 2022 arrest by detectives from the 110th Precinct in Queens. The claims in this case were severed from a related case, 24 Civ. 514 (JMF), in the Southern District of New York and transferred to this Court. (ECF No. 7). By Order dated December 10, 2024, this Court dismissed several claims but ordered Corporation Counsel to identify two John Doe Detectives pursuant to Valentin v. Dinkins, 121 F.3d 72 (2d Cir. 1997). (ECF No. 11).

Since receiving the Court's Order, this office has been actively investigating this matter, including coordinating with multiple units within the NYPD to obtain relevant

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<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Jack McLaughlin, who is presently awaiting admission to the Eastern District of New York and is handling this matter under my supervision. Mr. McLaughlin may be reached directly at (212) 356-2670 or by email at jmclaugh@law.nyc.gov.

documentation and personnel information. Despite diligently working to obtain records, we received critical arrest paperwork only today. Through careful review of these documents, we have identified two detectives whom we believe are the John Does identified in the complaint. However, we have not yet been able to speak with either detective to ascertain their true involvement. Complicating matters, one of the detectives is retired, and we have not yet been able to obtain contact information for him or a service address to provide to the Court.

As such, we respectfully request a three-week extension to confirm that these two individuals are the John Does referenced in Plaintiff's complaint and to ascertain proper service addresses for them.

The undersigned thanks the Court for its time and consideration of this request.

Respectfully Submitted,

*Joseph Zangrilli /s/*

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